

CRIMINAL COMPLAINT  
(Submitted electronically)

United States District Court	DISTRICT of ARIZONA
United States of America v. Robert VALDEZ, JR.; DOB: 2002; United States Citizen	DOCKET NO.
	MAGISTRATE'S CASE NO. 23-09309MJ

Complaint for violations of Title 18, United States Code §§ 922(a)(1)(A) and 924(a)(1)(D)

## COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

Between on or about September 21, 2022, and on or about November 28, 2022, in the District of Arizona, Robert VALDEZ, JR., not being a licensed dealer of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

## BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

In the course of investigating other individuals for gun trafficking offenses in September 2022, agents with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) and Homeland Security Investigations (HSI), interviewed Robert VALDEZ, JR., on November 28, 2022. At the time of the interview, VALDEZ was not in possession of any firearms he previously acquired from various Arizona-based Federal Firearms Licensees (FFLs). VALDEZ claimed he had sold firearms to various unidentified individuals. VALDEZ also admitted to having a rotating firearms inventory, when he claimed he used the profits from his alleged private firearms sales to purchase subsequent firearms. VALDEZ claimed he used the profits from his private firearms sales to purchase subsequent firearms. Four of the firearms purchased by VALDEZ have been recovered in the Republic of Mexico. VALDEZ admitted that he dealt the following firearms to unidentified individuals:

One (1) Pioneer model Sporter 7.62 x 39 mm semi-automatic rifle (serial number: PAC1172610) and one (1) Century Arms model BFT 47 7.62 x 39 mm semi-automatic rifle (serial number: BFT47006741), originally purchased from SNG Tactical.

Two (2) Century Arms model VSKA 7.62 x 39 mm semi-automatic rifles (serial numbers: SV1724698, SV7124692), originally purchased from Roe Armory.

Two (2) Pioneer model Sporter 7.62 x 39 mm semi-automatic rifles (serial numbers: PAC1171127, PAC1171067), originally purchased from Desert Vista Gun Sales.

One (1) Palmetto State Armory model PSAK47 7.62 x 39 mm semi-automatic rifle (serial number: AKB078267), originally purchased from Citywide Supply.

Two (2) Pioneer Arms model Sporter 7.62 x 39 mm semi-automatic rifles (serial numbers: PAC1177318, PAC1180970), originally purchased from Shoot Em Up at a gun show in Tucson.

One (1) Century Arms model VSKA 7.62 x 39 mm semi-automatic rifle (serial number: SV7122800), originally purchased from Citywide Supply.

One (1) Century Arms model VSKA 7.62 x 39 mm semi-automatic rifle (serial number: SV7132484), originally purchased from Liberty Pawn Shop.

One (1) Pioneer model Sporter 7.62 x 39 mm semi-automatic rifle (serial number: PAC1172319), originally purchased from Citywide Supply.

Two (2) Century Arms model BFT47 7.62 x 39 mm semi-automatic rifles (serial numbers: BFT47016582, BFT47016588), originally purchased from Roe Armory at a gun show in Tucson.

An ATF Industry Operation Investigator (IOI) performed a search of Robert VALDEZ with a corresponding birthdate in 2002, in the Federal Licensing System (FLS) and confirmed that VALDEZ has never been licensed by ATF to sell firearms.

## MATERIAL WITNESSES IN RELATION TO THE CHARGE: None

DETENTION REQUESTED Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	SIGNATURE OF COMPLAINANT MATTHEW MANOOGIAN <small>Digitally signed by MATTHEW MANOOGIAN Date: 2023.12.19 12:27:36 -07'00'</small>
AUTHORIZED by R.Arellano, Assistant U.S. Attorney	OFFICIAL TITLE Special Agent Matthew H. Manoogian, Bureau of Alcohol, Tobacco, Firearms, and Explosives

Sworn to telephonically.

SIGNATURE OF MAGISTRATE JUDGE <sup>1)</sup>	DATE December 19, 2023
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<sup>1)</sup> See Federal Rules of Criminal Procedure Rules 3 and 54